
From: (b) (6)
Sent: Saturday, March 25, 2017 10:20 AM
To: Allnutt, David
Cc: (b) (6)
Subject: EPA DEIS review: Growlers at NASWI
Attachments: FIDELL COMMENTS ON NAVY DEIS.pdf; DEIS - Addendum 1.docx; DEIS - Addendum 2.docx; DEIS - Addendum 3.docx; DEIS - Addendum 4.docx; DEIS - Addendum 5.docx; DEIS - All COER Comments.docx

Dear Dr. Allnutt,

This is in response to the March 8, 2017, USEPA comments you submitted to Lisa Pagett regarding the Draft Environmental Impact Statement (DEIS) for the Navy's plans to expand operations at Naval Air Station Whidbey Island.

The board of directors of the Citizens of Ebey's Reserve (COER) recently submitted extensive comments on the DEIS, which concur with and support the EC-2 findings of the EPA. In regard to the second to last paragraph in the EPA review in which you request to be informed of any new information the Navy acquires that can augment existing information, we are providing one such piece you may or may not be aware of, i.e., the 65-dB threshold for high annoyance. The Navy holds this up as a scientifically valid threshold in the DEIS, even though it recently has become invalidated and discredited by the International Standards Organization (ISO).

COER retained international noise expert Sandy Fidell to comment on this matter and other related problems with the DEIS use of this now-defunct standard. His analysis is attached. We also retained other experts in the environmental health and noise arena which can be examined at <http://citizensofebaysreserve.com/LinksAndFiles.html> . I have also attached our COER review, which may contain additional points of interest to you.

If you have any questions or interests, please do feel free to contact either of us by email or phone, and please know we greatly appreciate your solid, objective analysis of the DEIS.

Regards

(b) (6), President, COER, (b) (6)

(b) (6), COER Board Member, (b) (6)